

# **EXHIBIT G**

**From:** [Heather Kliebenstein](#)  
**To:** [Fleming, Terrence](#)  
**Cc:** [Joe Dubis, Ph.D.](#); [Allen Hinderaker](#); [Janus, Leah](#); [Pham, Christopher](#);  
["15081.0008USZA.active@ef.merchantgould.com"](#)  
**Subject:** RE: Depositions  
**Date:** Thursday, February 13, 2020 9:16:00 PM

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Terry,

We need clarification between your email and our conversation. In our conversation, I understood these witnesses would be used to lay foundation for documents. Your email suggests these witnesses will be presented generally for the subject matter listed below, and not simply to lay foundation for documents. If the purpose for the witness is to lay the foundation for gross written premium documents/data and financial documents/data, please identify those documents that you intend to lay foundation for through these witnesses. Perhaps we can stipulation to the foundation of those documents.

Heather

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**From:** Fleming, Terrence <TFleming@fredlaw.com>  
**Sent:** Wednesday, February 12, 2020 3:17 PM  
**To:** Heather Kliebenstein <HKliebenstein@merchantgould.com>; Allen Hinderaker <AHinderaker@merchantgould.com>; Joe Dubis, Ph.D. <JDubis@MerchantGould.com>  
**Cc:** Janus, Leah <LJanus@fredlaw.com>; Pham, Christopher <CPham@fredlaw.com>  
**Subject:** Depositions

**CAUTION - External.**

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Heather,

Confirming the discussion we had this afternoon, Defendants intend to call Stuart Fisher, Mike Hutchinson, Paul Johnston, Andrea Phillips, and Runesh Roy as trial witnesses for foundation purposes limited to the following topics:

Stuart Fisher (Australia gross written premiums);  
Mike Hutchinson (Europe gross written premiums);  
Paul Johnston (Europe financial information);  
Andrea Phillips (Canada financial information); and  
Runesh Roy (Australia financial information).

Given the limited scope of their testimony, we are requesting that these depositions be held by videotape depositions in the city where they reside. Let us know if you agree with this process.

Terry



**Terrence J. Fleming**

## Shareholder

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